

Gregory Reilly
LITTLER MENDELSON
A Professional Corporation
Attorneys for Plaintiff
885 Third Avenue, 16th Floor
New York, New York 10022
(212) 583-9600

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND
MANAGEMENT COMPANY, AIMCO
PROPERTIES, L.P., NHP MANAGEMENT,
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

Case No. 07 Civ. 6435

**NOTICE OF CONSENT MOTION
FOR
ADMISSION *PRO HAC VICE***

2007 OCT 22 11 41 AM

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PLEASE TAKE NOTICE that on October 22, 2007, or as soon thereafter as counsel may be heard, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, the undersigned, counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc., shall move before the Honorable Laura Taylor Swain, at the United States District Court House located at 500 Pearl Street, New York, New York 10007, for the entry of an Order admitting John M. Husband as co-counsel *pro hac vice* for all purposes in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, counsel for Defendants shall rely on the accompanying Certification of Gregory Reilly, attached hereto as **Exhibit A** and John M. Husband, attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that Plaintiffs have no objections to this Motion.

PLEASE TAKE FURTHER NOTICE that the issues raised in this Motion do not require the submission of a brief to the Court.

Dated: October 22, 2007.

Respectfully submitted,

LITTLER MENDELSON
A Professional Corporation

By: 

Gregory Reilly (GBR-6189)
885 Third Avenue, 16th Floor
New York, New York 10022
(212) 583-9600

ATTORNEYS FOR DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND
MANAGEMENT COMPANY, AIMCO
PROPERTIES, L.P., NHP MANAGEMENT,
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

Case No. 07 Civ. 6435

**CERTIFICATION OF
GREGORY REILLY IN SUPPORT
OF MOTION FOR ADMISSION
*PRO HAC VICE***

Gregory Reilly, of full age, certifies as follows:

1. I am a shareholder of the law firm of Littler Mendelson P.C., counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. ("AIMCO") in the above-captioned matter, and I am familiar with the facts set forth in this Certification.

2. I am an attorney in good standing of the Bar of the State of New York. My office is located at 885 Third Avenue, 16th Floor, New York, New York 10022. I am admitted to practice before the United States District Court for the Southern District of New York. I have never been the subject of any disciplinary sanction as member of the Bar in any jurisdiction.

3. As stated in the accompanying Certification of John M. Husband, Mr. Husband is partner with the firm Holland & Hart LLP, and is a member in good standing of the Bar of the State of Colorado. He also is admitted to practice before the United States Supreme Court, United States District Court for the District of Colorado, United States Court of Appeals for the



4. In accordance with Local Civil Rule 1.3(c), I shall act as counsel of record for purposes of this litigation and accept service of all notices, orders and pleadings along with Mr. Hazard. I also shall be responsible for the conduct of Mr. Hazard should the Court grant this Motion.

5. Plaintiffs' counsel have been fully apprised regarding this Motion and have consented to the granting thereof.

6. I respectfully request that this Court grant this Motion admitting Thomas E.J. Hazard, *pro hac vice*, for all purposes as co-counsel on behalf of the Defendants in all stages of the above-captioned matter.

7. I hereby certify that the foregoing statements made by me are true and to the best of my knowledge. I understand that if any of the foregoing is willfully false, I am subject to punishment.

Dated: October 22, 2007.

By: _____

Gregory Reilly

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND
MANAGEMENT COMPANY, AIMCO
PROPERTIES, L.P., NHP MANAGEMENT,
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

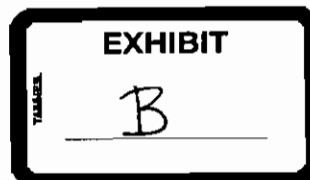
Case No. 07 Civ. 6435

**CERTIFICATION OF
JOHN M. HUSBAND IN SUPPORT
OF MOTION FOR ADMISSION
*PRO HAC VICE***

John M. Husband, of full age, certifies as follows:

1. I am a partner of the law firm of Holland & Hart, LLP, co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. in the above-captioned matter, and I am familiar with the facts set forth in this Certification.

2. I am an attorney-at-law and a member in good standing of the Bar of the State of Colorado. My office is located at 555 17th Street, Suite 3200, Denver, Colorado 80202. I am admitted to practice before the United States Supreme Court, United States District Court for the District of Colorado, United States Court of Appeals for the District of Columbia Circuit, United States Court of Appeals for the Tenth Circuit, United States Court of Appeals for the Ninth Circuit, and United States Court of Appeals for the Eighth Circuit. I have never been the subject of any disciplinary sanction as member of the Bar in any jurisdiction.



3. I submit this Certification in support of my application to appear before this Court *pro hac vice* as co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. in the above-captioned case.

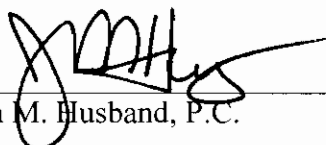
4. This case involves unique federal wage and hour issues. I have specialized in the field of labor and employment law and my practice is limited primarily to this area of law.

5. If admitted to practice before the Court *pro hac vice*, I will abide by the requirements of the rules of this Court. I will also be available for court conferences, motion dates, and trial dates.

6. Accordingly, it is respectfully requested that this Court grant this Motion to appear *pro hac vice* and enter an Order permitting me to appear and participate as co-counsel in the above-captioned case.

7. I hereby certify that the foregoing statements made by me are true and to the best of my knowledge. I understand that if any of the foregoing is willfully false, I am subject to punishment.

Dated: October 22, 2007.

By: 
John M. Husband, P.C.

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Certificate of Good Standing

United States District Court
District of Colorado

I, Gregory C. Langham, Clerk of the United States District Court
DO HEREBY CERTIFY

JOHN M. HUSBAND

was duly admitted to practice in said court on

October 4, 1978

and is in good standing as a member of the bar of said court.

Dated: October 18, 2007

Gregory C. Langham, Clerk

By: Mark J. Fredrickson
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
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GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND
MANAGEMENT COMPANY, AIMCO
PROPERTIES, L.P., NHP MANAGEMENT,
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

Case No. 07 Civ. 6435

CERTIFICATE OF SERVICE

Gregory Reilly, of full age, certifies as follows:

1. I am an attorney-at-law duly admitted to practice in this Court, and a member of the law firm of Littler Mendelson, P.C., counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. in the above-captioned matter. I am familiar with the facts set forth in this Certification.

2. I caused a true and correct copy of Defendants' Notice of Motion for Admission *Pro Hac Vice*, along with the accompanying Certifications of Gregory Reilly and John M. Husband to be served upon the following *via* hand delivery this 22nd day of October 2007:

Steig Olson
Cohen Milstein Hausfeld & Toll PLLC
152 East 52nd St., 13th Floor
New York, NY 10022
solson@cmht.com

Joseph M. Sellers
Charles E. Thompkins
Llezie L. Green
Cohen Milstein Hausfeld & Toll PLLC
1100 New York Ave NW
West Tower, Suite 500
Washington, DC 20005
jsellers@cmht.com
cthompkins@cmht.com
lgreen@cmht.com

3. I hereby certify that the foregoing statements made by me are true and to the best of my knowledge. I understand that if any of the foregoing is willfully false, I am subject to punishment.

Dated: October 22, 2007.

LITTLER MENDELSON
A Professional Corporation

By: 

Gregory Reilly (GBR-6189)
885 Third Avenue, 16th Floor
New York, New York 10022
(212) 583-9600

ATTORNEYS FOR DEFENDANTS

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND
MANAGEMENT COMPANY, AIMCO
PROPERTIES, L.P., NHP MANAGEMENT,
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

Case No. 07 Civ. 6435

**ORDER GRANTING
ADMISSION *PRO HAC VICE*
(ON CONSENT)**

This matter having come before the Court on the Motion of Gregory Reilly, a member in good standing of the bar of this Court, for leave to permit John M. Husband, Esq. to appear in this action *pro hac vice*, as co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc., and the Court being sufficiently advised that John M. Husband, Esq. is licensed and admitted to practice law for the State Bar of Colorado and before the United States Supreme Court, United States District Court for the District of Colorado, United States Court of Appeals for the District of Columbia Circuit, United States Court of Appeals for the Tenth Circuit, United States Court of Appeals for the Ninth Circuit, and United States Court of Appeals for the Eighth Circuit, it hereby **GRANTS** said motion; and

IT IS HEREBY ORDERED that John M. Husband is granted leave to appear in this action *pro hac vice*, as co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. on consent.

Dated: _____, 2007

United States District Judge

Order Granting Admission Pro Hac Vice - Husband.doc